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Attorneys for Petitioner Molson USA, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MOLSON USA, LLC, :
Petitioner, : 07 Civ. 6965 (HB)
-against- :
JOHN G. RYAN, INC., :
Respondent. :
-----X

**AFFIDAVIT IN SUPPORT
OF MOTION FOR
DEFAULT JUDGMENT**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Jeremy L. Wallison, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and am associated with the firm of Foley & Lardner LLP, attorneys for Petitioner in the above-entitled action, and I am familiar with the facts and circumstances in this action.
2. I make this affidavit in support of Petitioner's motion for default judgment.

3. Jurisdiction of the subject matter of this action is conferred under 28 U.S.C. § 1332, in that the Petitioner and Respondent are citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

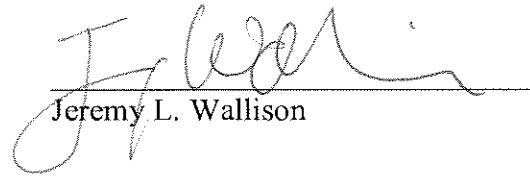
4. This action was commenced on August 3, 2007, by the filing of the Summons and Petition. A true and correct copy of the Petition is attached hereto as Exhibit A. Respondent waived service of the Summons and Petition on August 14, 2007, and Petitioner filed such waiver on the same date. The Respondent has not answered the Petition and the time for the Respondent to answer the Petition has expired.

5. A Clerk's Certificate, noting Respondent's default, was entered by the Clerk of the United States District Court for the Southern District of New York on October 16, 2007. The original signed and sealed Clerk's Certificate is attached hereto as Exhibit B.

6. Respondent is a corporation and, as such, is neither an infant nor in the military nor an incompetent person.

WHEREFORE, Petitioner requests that the court grant Petitioner's Motion for Default Judgment and sign and enter the proposed form Default Judgment Order attached hereto as Exhibit C.

Dated: New York, New York
October 22, 2007



Jeremy L. Wallison

Sworn to before me this 22nd
day of October, 2007



Samantha S. Edite

Notary Public

SAMANTHA S. EDITE
NOTARY PUBLIC, State Of New York
No. 01ED6068678
Qualified In Kings County
Commission Expires Jan. 14, 2010